

1 SANG N. DANG (NO. 214558)
sdang@koslaw.com
2 **KLEIN, O'NEILL & SINGH, LLP**
43 Corporate Park
3 Suite 204
Irvine, CA 92606
4 Telephone: 949-955-1920
Facsimile: 949-955-1921

5 Attorneys for Plaintiff
6 **PLUSTEK INC.**

7
8 YUNG MING CHOU (NO. 172118)
Chouyung@aol.com
9 39111 Paseo Padre Parkway, Suite 207
Fremont, CA 94538
10 Telephone: 510-713-8698
Facsimile: 510-713-8690

11 Attorney for Defendant
12 **SYSCAN, INC.**

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 PLUSTEK INC.,

19 Plaintiff,

20 vs.

21 SYSCAN, INC.

22 Defendant.
23
24
25
26
27
28

Case No. C 07-05718 JL

**STIPULATION REGARDING CASE
SCHEDULE AND [PROPOSED] ORDER**

WHEREAS, on November 9, 2007, Plaintiff Plustek Inc. (“Plustek”) filed an action in the United States District Court for the Northern District of California against Defendant Syscan, Inc. (“Plustek”), requesting, *inter alia*, for a declaratory judgment that Plustek does not infringe any claims of U.S. Patent No. 6,705,124 (the “‘124 Patent”), and that the ‘124 Patent is invalid.

WHEREAS, the Court issued a Claim Construction Order on December 21, 2009 (Docket No. 44), and ordered the Parties to submit a proposed schedule for further proceedings.

WHEREAS, through their respective counsel of record, the Parties have met and conferred to discuss the case schedule.

NOW, THEREFORE, the Parties, through their respective counsel of record, hereby stipulate and respectfully request the Court to order the case schedule as follows:

PLEADING OR EVENT	DATE
The Parties’ respective Amended Infringement Contentions and Amended Invalidity Contentions (Patent L.R. 3-6)	January 20, 2010 (subject to the order of the Court upon a timely showing of good cause)
The Parties’ respective Advice of Counsel (Patent L.R. 3-7)	February 9, 2010
Close of fact discovery re merits of claims and defenses	March 31, 2010
Initial Expert Reports on issues on which party bears the burden of proof at trial	May 10, 2010
Rebuttal Expert Reports	June 9, 2010
Close of Expert Discovery	August 5, 2010
Dispositive Motions and Motions to Bifurcate Trial (last day to file)	August 26, 2010

1	Oppositions to Dispositive Motions and	September 9, 2010
2	Motions to Bifurcate Trial	
3		
4	Replies to Dispositive Motions and Motions to	September 16, 2010
5	Bifurcate Trial	
6	Completion and Filing of Pretrial Order	TBD
7		
8	Final Pretrial Conference	TBD
9		
10	Trial	TBD

11
12 DATED: December 30, 2009

13 By /s/ Yung Ming Chou

14 Yung Ming Chou
15 Attorneys for Defendant
16 **SYSCAN, INC.**

17
18 DATED: December 30, 2009

19 KLEIN, O'NEILL & SINGH, LLP

20 By /s/ Sang N. Dang

21 Sang N. Dang
22 Attorneys for Plaintiff
23 **PLUSTEK INC.**

PROPOSED ORDER

It is so **ORDERED**.

DATED: January 11, 2010


~~U.S. CHIEF~~ MAGISTRATE JUDGE